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January 11, 2019

BY ECF

Honorable Nicholas G. Garaufis
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

RE: United States of America v. Lauren Salzman, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

We are writing to you on behalf of our client, Lauren Salzman ("Ms. Salzman"), to respectfully request a modification to the Court's Order Setting Release Conditions (DKT. 91; "Bail Order") as set forth below:

On January 9, 2019, the Court affirmed the March 18, 2019 trial date in this case. Counsel will need to spend considerable time with Ms. Salzman in order to continue to prepare for trial. Because counsel's trial preparation materials are in counsel's Phoenix office, we request that Ms. Salzman be allowed to travel from Albany, New York to Phoenix, Arizona (District of Arizona) so that she can meet with her attorneys at our law firm, Quarles & Brady, LLP, in Phoenix, Arizona in order to prepare for trial on the following dates: January 20-26, 2019; February 10-16, 2019; and February 24-March 2, 2019.

We have discussed this proposed modification to Ms. Salzman's Bail Order, as well as the logistics of her travel and accommodations, with both the government and Pretrial Services. The government consents to this proposed modification, so long as the current trial date remains

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in place.¹ Pretrial Services has informed that they have no objection to the proposed modifications.

Very truly yours,

/s/
Hector J. Diaz
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HJD:vl

CC: All Counsel (by ECF)

¹ Ms. Salzman has filed a Motion for Sever. (DKT. 267-268). The Court's ruling on this Motion *may* impact the present trial schedule. Should this occur, of course, counsel will work with the government and Pretrial to modify any travel schedule.